## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	3:15-cr11-01
	§	
DENNIS P.M. HUGHES	§	

# HUGHES' UNOPPOSED MOTION TO CONTINUE THE PSR OBJECTIONS AND SENTENCING

Dennis P.M. Hughes, through Neal Davis, files this unopposed motion to continue all dates for at least 30 days from the current schedule, pending this Court's ruling on his motion to withdraw his plea, showing specifically:

- 1. Hughes is charged with several counts involving child pornography.
  - 2. He has pled guilty.
  - 3. He has filed a motion to withdraw his plea, which is pending.
- 4. Since this motion is pending, he is moving to continue all dates, including for PSR objections and sentencing. His PSR objections are due next week.
- 5. Hughes respectfully requests continuing all dates for at least 30 days from the current set dates, given this Court's pending ruling (undersigned also has a two week vacation at the end of July to the

beginning of August 2016, with a letter on file with the Harris County District Clerk).

6. Undersigned has contacted the prosecution, and they are unopposed to this continuance.

Hughes therefore prays that all dates be continued.

Respectfully submitted,

NEAL DAVIS LAW FIRM, PLLC

/s/

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**Neal Davis** 

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Facsimile: (800) 769-7140 Email: Neal@NealDavisLaw.com

Defendant's lawyer

### CERTIFICATE OF CONFERENCE

I certify I have emailed Assistant United States Sherri Zack about this Motion to Continue on July 12, 2016, and she is UNOPPOSED.

Neal Davis	

## CERTIFICATE OF SERVICE

I certify that copy of this Motion to Continue has been sent to the Assistant United States Attorney on June 15, 2016, via PACER/ECF filing.

/s/		
Neal Davis		

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#### ORDER

Whereas, Hughes and his attorney have filed a motion requesting a continuance setting forth the grounds for continuance in the attached motion, the Court finds that the ends of justice would be served to the best interest of the public and the defendant, pursuant to Title 18, United States Code, Section 3161(h)(8), et seq, by the granting on the motion for continuance of sentencing, and the period of delay resulting from granting this continuance shall be excludable under the Speedy Trial Act at 18 U.S.C. 3161.

The motion for continuance is granted and a new scheduling order shall issue.

UNITED STATES DISTRICT JUDGE